

Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the **Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000**, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with **44 CFR Part 201 – Mitigation Planning, Interim Final Rule** (the Rule), in accordance with the **Stafford Act** (42 U.S.C. 5165), and **44 CFR Part 78.5 – Flood Mitigation Plan Development**, in accordance with the **National Flood Insurance Act of 1968** (42 U.S.C. 4104c et seq).

SCORING SYSTEM

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

Example

Assessing Vulnerability: Overview

- Multihazard Requirement §201.6(c)(2)(ii):** *[The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.*
- FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			Stafford		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		✓		✓
B. Does the plan address the impact of each hazard on the jurisdiction?	Section II, pp. 10-20	The plan does not address the impact of one of the five hazards addressed in the plan. Required Revisions: <ul style="list-style-type: none">Include a description of the impact of earthquakes on the assets. Recommended Revisions: <ul style="list-style-type: none">This information can be presented in terms of dollar value or percentages of damage.	✓			✓
SUMMARY SCORE			✓			✓

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VIII

Jurisdiction: Wheatland County, Montana

Local Mitigation Plan Review and Approval Status

Jurisdiction: Wheatland County, Montana	Title of Plan: Pre-Disaster Mitigation Plan Wheatland County, Montana Revised Draft	Date of Plan: March, 2007
Local Point of Contact: Dave Smith	Address: Wheatland County Disaster and Emergency Services 201-A Avenue NW Harlowton, MT 59036-1903	
Title: Disaster and Emergency Services Coordinator		
Agency: Wheatland County		
Phone Number: 406-632-5815	E-Mail: wcdes@mtintouch.net	

State Reviewer: Kent Atwood	Title: State Hazard Mitigation Officer	Date: May 9, 2007
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FEMA Reviewer: Kathleen Collins Nan Johnson	Title: Senior Planner, URS Corporation Planner, FEMA	Date: August 20, 2007 December 7, 2007
Date Received in FEMA Region VIII	May 17, 2007	
Plan Not Approved		
Plan Approved	XXXXXXX [Note: FMA requirements not met.]	
Date Approved	December 10, 2007	

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. Wheatland County (Effective 9/16/81)	X			---
2. Town of Harlowton (Effective 9/16/81)	X			---
3. Town of Judith Gap (Not listed as community on CIS website)		X	X	---
4.				
5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS]				

* Notes: Y = Participating N = Not Participating N/A = Not Mapped

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement.
Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite(s) (Check Applicable Box)

Adoption by the Local Governing Body:
§201.6(c)(5) and §78.5(f)

OR

Multi-Jurisdictional Plan Adoption: §201.6(c)(5)
and §78.5(f) **AND**

Multi-Jurisdictional Planning Participation:
§201.6(a)(3) and §78.5(a)

Planning Process

Documentation of the Planning Process:
§201.6(b) and §201.6(c)(1) and §78.5(a)

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i) and §78.5(b)

Profiling Hazards: §201.6(c)(2)(i) and §78.5(b)

Assessing Vulnerability: Overview:
§201.6(c)(2)(ii) and §78.5(b)

Assessing Vulnerability: Identifying Structures:
§201.6(c)(2)(ii)(A) and §78.5(b)

Assessing Vulnerability: Estimating Potential
Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development
Trends: §201.6(c)(2)(ii)(C)

Multi-Jurisdictional Risk Assessment:
§201.6(c)(2)(iii) and FEMA 299

STAFFORD		FMA	
NOT MET	MET	NOT MET	MET
N/A		N/A	
	X		X
	X		X
N	S	N	S
	X		X
N	X	N	X
	X		X
	X		X
	X		X
X		X	
	X		X
	X		X
	X		X

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i) and
§78.5(c)

Identification and Analysis of Mitigation Actions:
§201.6(c)(3)(ii) and §78.5(d)

Implementation of Mitigation Actions:
§201.6(c)(3)(iii) and §78.5(d) and (e)

Multi-Jurisdictional Mitigation Actions:
§201.6(c)(3)(iv) and FEMA 299

STAFFORD		FMA	
N	S	N	S
	X		X
	X		X
	X		X
	X		X

Plan Maintenance Process

Monitoring, Evaluating, and Updating the Plan:
§201.6(c)(4)(i) and §78.5(e)

Incorporation into Existing Planning Mechanisms:
§201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

STAFFORD		FMA	
N	S	N	S
	X		X
	X		X
	X		X

Additional State Requirements*

Insert State Requirement

Insert State Requirement

Insert State Requirement

STAFFORD		FMA	
N	S	N	S

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

PLAN APPROVED

STAFFORD	FMA
	X
X	

*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

See Reviewer's Comments

Reviewer's Comments: An Overview of the Wheatland County, Montana Plan

Overall Comments

The plan was well formatted, provided a good description of the planning process, included an adequate risk assessment, and met the requirements of describing the mitigation strategy and plan maintenance. The plan met all Stafford requirements pending adoption, but did not meet all FMA requirements.

Plan Organization/Format

The plan was approved for meeting Stafford requirements. The plan was very strong in meeting many element requirements and was reader friendly in its organization. It also provided sound documentation of the planning process and the risk assessment in general. One minor improvement that would be recommended is that geologic hazards and their past events, particularly related to landslides/avalanches be assessed in greater detail. The plan indicated that landslides were initially assessed, but then did not provide information on the resources it referenced to make the determination not to include it in the risk assessment. Including this information would improve an otherwise very strong plan. The Plan was not approved for FMA because the Plan did not identify specific types or numbers of critical structures in flood prone areas or identify repetitive loss structures.

Public/Stakeholder Participation & the Planning Process

The plan indicates jurisdictions of Harlowton and Judith Gap exist in the County as well as three Hutterite Colonies; however, no specific mention is made that any of these jurisdictions are seeking plan approval. The SHMO crosswalk attached indicates that both Harlowton and Judith Gap are seeking plan approval. The Montana State University has an extension in Harlowton. See <http://extn.msu.montana.edu/counties/wheatland.htm> for more information. Including the University in the planning process and as a resource would improve the plan and the process to develop it.

Risk Assessment

▪ The plan did not pass FMA requirements as repetitive flood losses were not identified or evaluated in the plan. See crosswalk pages 18-19 for more details.

In general, the Plan provided an excellent description of hazards and utilized great resources to compile data aside from the comments noted above in reference to geologic hazards. In order to continue to strengthen the required planning elements during future revisions, concentrate on mapping hazard locations to identify a comprehensive tool and identify repetitive loss properties. The Plan could also be strengthened if a table was included that lists the location of hazard, date, time, magnitude, death, injuries, property damage and crop damage. This table would help address the extent of hazards and to provide detailed information on previous occurrences.

Mitigation Strategy

Generally, this section is very well organized and successfully meets the requirements of the rule.

Plan Maintenance

The Plan described the method and schedule of monitoring, evaluating, and updating the mitigation plan in great detail.

About Plan & Crosswalk Reviews in General:

Your multi-hazard mitigation plan's review includes five required DMA & FMA components: adoptions by the participating jurisdictions, consideration of the public/stakeholder participation and planning process, the risk assessment, the mitigation strategy, and the maintenance of the plan. In addition to these requirements, your plan is considered for its format and organization such that it is a user friendly document that is legible and easily understood.

We look to see if your plan meets the requirements and gauge if there is opportunity to strengthen the weaker segments of the plan. If so, we offer suggestions and recommendations for improvements often referring to additional resources or to guide the plan's developer(s) back to the FEMA "How-To Guides." In your plan updates, these recommendations may or may not be required as part of the improvement to the overall quality of submitted plans, which in turn helps to build stronger mitigation project applications. If a requirement has not been met, language will be included in red text for "Required Revisions" needed for the plan's approval. Please keep in mind that your State Hazard Mitigation Officer (SHMO) is a team member and a resource available to you during the multi-hazard mitigation planning process.

In addition, recommended revisions are provided in order to share various approaches available to meet plan requirements for each element of the crosswalk. Several resources are identified in the recommendations that may allow for more informed decision-making in the development of the mitigation strategy.

- ***Plan Format/Organization***

Reviewers look for documents that are well-organized, easy to read, and structured in a way that requirements met are easily identified. A general recommendation is to use the crosswalk elements as an outline in developing the plan's table of contents.

- ***Adoptions***

Provide unsigned copy(-ies) of the resolutions or certificates with the plan. After a plan has been determined "approvable" then the jurisdictions are asked to adopt the plan. This is to make sure that any requested revisions are captured as part of the adopted plan.

- ***Public/Stakeholder Participation and the Planning Process***

Providing supporting documentation of public/stakeholder involvement and outreach activities is strongly recommended. Documentation would include meeting notes, copies of invitations to meetings that were distributed, and sign-in sheets that indicate who and which jurisdictions were represented at planning meetings. It is also critical to describe the type of discussions held at public meetings to ensure that the mitigation strategy represents the viewpoints of all participating jurisdictions.

- ***Risk Assessment***

Identifying references for data presented in the plan is an important consideration. Referenced data should be commonly acknowledged as a reliable resource in order for the risk assessment to be meaningful. If reliable data is not available for meeting plan requirements, consider making it a mitigation action to obtain the data. Reviewers will typically include a list of internet resources for the plan preparation team in an effort to strengthen revised drafts and updates. Reviewers will have already visited many of these sites to ensure they include data specific to the participating jurisdictions. Another important consideration is to assess the interrelation between hazards, i.e. wildfire impacts that can lead to soil erosion, which then can lead to potential flash flooding. In addition, an assessment of how risks vary or are unique within an individual participating jurisdiction should be included in the plan.

- ***Mitigation Strategy***

Good plans are to be driven by their goals, objectives, strategies, and priorities; not by their projects. The mitigation strategy is to be based on the risk assessment findings. Also, keep in mind that grant eligibility for mitigation is primarily focused on long-term mitigation projects and not on preparedness, which are the short-term immediate response focused projects (i.e. only 5% of HMGP is eligible for preparedness projects).

- ***Plan Maintenance***

The development of a plan is intended to be an evolving process. Therefore, it is anticipated that plan updates display an effort to improve the major components of the plan including providing more details about and improving the public involvement, risk assessment, mitigation strategy, and plan maintenance activities.

Color Coding of Crosswalk Comments: Red = did not meet requirement, Blue = recommendation, Black = general comment/observation.

PREREQUISITE(S)

Adoption by the Local Governing Body

- **Multihazard Requirement §201.6(c)(5):** *[The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Has the local governing body adopted the plan?	N/A					
B. Is supporting documentation, such as a resolution, included?	N/A					
SUMMARY SCORE						

Multi-Jurisdictional Plan Adoption

- **Multihazard Requirement §201.6(c)(5):** *For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	Page 2	<p>The plan indicates jurisdictions of Harlowton and Judith Gap exist in the County as well as three Hutterite Colonies; however, no specific mention is made that any of these jurisdictions are seeking plan approval. The crosswalk attached indicates that both Harlowton and Judith Gap are seeking plan approval.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Provide a simple sentence identifying all the jurisdictions seeking plan approval in the plan's introduction. 		X		X

		<ul style="list-style-type: none"> Provide a complete description or list of communities and districts within the governing jurisdiction. Then distinguish which communities are seeking plan approval in the body of the plan – at the beginning of the plan. It may be helpful to understand why some communities/districts within the jurisdiction may not be participating in the plan's adoption. Make sure each community seeking plan approval has their own adoption papers. <p>For more information about adopting the mitigation plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 1.</p>				
B. For each jurisdiction, has the local governing body adopted the plan?	Appendix A	<p>Yes. Wheatland County (Resolution #86) adopted on September 5, 2007; City of Harlowton adopted on November 13, 2007; and the Town of Judith Gap on September 12, 2007.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> For future plan updates, Include an unsigned copy of the formal resolution in the plan for review. In the main text of the final plan, document when, and by whom, the plan was formally adopted. <p>For more information about adopting the mitigation plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 1.</p>		X		X
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	Appendix A	Yes – see above in B.				
SUMMARY SCORE				X		X

Multi-Jurisdictional Planning Participation

- **Multihazard Requirement §201.6(a)(3):** *Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.*
- **FMA Requirement §78.5(a):** *Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan describe how each jurisdiction participated in the plan's development?	Pages 6-8; Appendix B.	<p>Two public meetings took place on May 16, 2006 one in Judith Gap and the other in Harlowton. Meeting sign-in sheets are provided in Appendix B. Evidence of attendance by representatives of both Judith Gap and Harlowton is provided.</p> <p>Recommended Revisions:</p> <p>Include in the description the composition of the [committee/planning team] and how each member contributed to the process (i.e., what was his/her role). Describe who led the development of the plan at the staff level, whether there were external contributors (such as a contractor), and what other interested parties were involved.</p> <p>For more information on initiating a comprehensive local mitigation planning process, see <i>Getting Started (FEMA 386-1), Steps 1 - 3.</i></p>		X		X
SUMMARY SCORE				X		X

PLANNING PROCESS:

Documentation of the Planning Process

- **Multihazard Requirement §201.6(b):** *An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:*
 - (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
 - (2) *An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and*

(3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.

- **Multihazard Requirement §201.6(c)(1):** *[The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.*
- **FMA Requirement §78.5(a):** *Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan provide a narrative description of the process followed to prepare the plan?	Pages 6-8	Section 2 of the plan document outlines the planning process. Steps in the process included Review of Existing Plans and Studies; a Hazard Profile Survey; and Formal Public Meetings held on May 16, 2006. In addition, documentation of public notices, meeting summaries, and sign-in sheets are provided in Appendix B.		X		X
B. Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pages 6-8; Appendix B	<p>Appendix B provides the sign-in sheets for the various public meetings along with meeting summaries that indicate resources available and information discussed. However, the roles each attendee played at the meeting is not clearly described.</p> <p>Recommended Revisions:</p> <p>Describe who was involved in the planning process.</p> <p>Include in the description the composition of the [committee/planning team] and how each member contributed to the process (i.e., what was his/her role). Describe who led the development of the plan at the staff level, whether there were external contributors (such as a contractor), and what other interested parties were involved.</p> <p>For more information on identifying the stakeholders and building the planning team, see <i>Getting Started</i> (FEMA 386-1), Step 2.</p>		X		X
C. Does the plan indicate how the public was involved?	Pages 6-8	Appendix B provides a copy of all the public notices		X		X

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
(Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)		<p>(local newspaper notices/ads) that were distributed during the planning process, and meeting summaries and sign-in sheets are also provided.</p> <p>Recommended Revisions: No planning department for Harlowton or Wheatland County was identified during an internet search. Including this information in the plan would improve it, so the reviewer understands that all existing planning entities were considered. .</p> <p>To improve the public outreach process someone or persons from the LEPC, Hazard Mitigation Team or county commissioners are strongly recommended to champion the plan and bring it to the attention of the community through community organizations such as churches, rotary clubs, and others. Another idea is to piggy-back hazard mitigation meetings onto other community events, such as conferences or i.e. the 9-Health Fair. More outreach to ensure success of public involvement is needed. Include an opportunity to engage elected officials, key stakeholders, and community leaders. See supporting documentation above</p> <p>Refer to FEMA How-To Guide #1 on initiating a comprehensive local mitigation planning process, see <i>Getting Started</i> (FEMA 386-1), Steps 1-3.</p>				
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Appendix B	<p>Local newspaper ads provided an opportunity for other interested parties and neighboring communities to be involved in the planning process.</p> <p>The Montana State University has an extension in Harlowton. See http://extn.msu.montana.edu/counties/wheatland.htm for more information. Including the University in the planning process and as a resource would improve the plan and the process to develop it.</p>		X		X

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
		Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.				
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Page 6; Appendix E	<p>This section describes how various existing plans and documents were gathered and reviewed. Appendix E has plan review worksheets as documentation of this review process. The plans reviewed included the County's emergency operations plan, five emergency action plans (EAPs) for one reservoir and four dams, a watershed protection and flood prevention work plan for Jawbone Creek Watershed; Subdivision regulations for Wheatland County and the towns of Harlowton and Judith Gap; and a comprehensive development strategy for the Snowy Mountain Development Corporation.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</p>		X		X
SUMMARY SCORE				X		X

RISK ASSESSMENT: §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

Identifying Hazards

- **Multihazard Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
<p>A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction?</p> <p>If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score.</p> <p>Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.</p>	Pages 9-50	<p>Each hazard type highlighted in the plan provides a description/definition of the type of event. In Table 3-16 on page 35 land subsidence and landslides are indicated as being evaluated during the plan development phase; however these two are not discussed in the risk assessment. For plan updates provide more details on the resources referenced and the rationale for not including specific hazards.</p> <p>SHELDUS data from 1/1/1960 to 12/31/2005 indicates that thunderstorms resulted in \$358K of property damage, winter storms resulted in 217K in property damage, and wind resulted in \$165K; See (www.sheldus.org) for more information. However, data in the plan (numerous resources identified) appears to be more detailed (NCDC) than SHELDUS data (see pages 9-50).</p> <p>The on-line resource indicates that Wheatland County, Montana does have a Flood Insurance Study (FIS). Principal Flood Problems are included in the FIS. Refer to http://msc.fema.gov/ (click on product catalog) for additional information. The plan references the creation of the FIS and does provide a discussion on principal flooding problems in the County.</p> <p>The plan indicates there are ten high hazard dams in the county and that three other dams outside of the county pose a potential threat. The Dam Failure assessment is quite detailed (see pages 27-30). The Montana DNRC is identified as the resource for this information. When Emergency Action Plans exist for a dam is it mentioned in the plan.</p> <p>Online EPA data suggests that there are no toxic release inventory sites in Wheatland County . Please see http://www.epa.gov/triexplorer/ for more information. Other hazardous material sites were</p>				
				X		X

		<p>referenced in the plan on page 4-80 taken from the Gallatin County Hazardous Material Plan, 2000.</p> <p>Another consideration that should be evaluated is scour potential for the County's bridges. Providing the names and locations of bridges with critical scour potential would improve this plan.</p> <p>Information provided on past events does indicate the jurisdictional location of past hazard events in the County. However, the hazard of landslide/avalanche is not addressed in the plan. Since the county does have a mountainous area to the north it would seem this may be a possible hazard to occur in the County.</p> <p>Recommended Revisions:</p> <p>When appropriate, identify on a map the areas affected by each identified hazard. A composite map (i.e., a map showing combined information from different thematic map layers) may be provided for hazards with a recognizable geographic extent, such as floods, wildfires, and landslides, if the individual hazard boundaries remain legible. See <i>Understanding Your Risks</i> (FEMA 386-2), Step 2, pages 2-3 to 2-6 and Step 3, page 3-6 for information on mapping techniques.</p> <p>Note any data limitations for profiling hazards and include in the mitigation strategy actions for collecting the data to complete and improve future risk analysis efforts.</p> <p>Use maps that show clearly all jurisdictional boundaries.</p> <p>Make the distinguishing features between elements in legends distinct enough to accurately differentiate.</p> <p>Recommended Resources:</p> <ul style="list-style-type: none"> National Climate Data Center at http://www.ncdc.noaa.gov/oa/climate/research. 				
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		html and the National Transportation Safety Board at www.nts.gov/nts/query.asp <ul style="list-style-type: none"> See <i>Understanding Your Risks</i> (FEMA 386-2), Step 2, Pages 2-3 to 2-6 and Step 3, Pages 3-6 for more information on mapping techniques. Even if GIS is not available, there are a number of websites that can be useful in developing maps for specific locations. Consider viewing the following on the internet www.hazards.gov, www.nationalmap.gov, www.nationalatlas.gov, www.geodata.gov, and www.geomac.gov 				
SUMMARY SCORE				X		X

Profiling Hazards

- Multihazard Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.*
- FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan?	Pages 9 to 50	<p>The location and extent of past events is described for each hazard type evaluated in the plan.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> When appropriate, identify on a map the areas affected by each identified hazard. A composite map (i.e., a map showing combined information from different thematic map layers) may be provided for hazards with a recognizable geographic extent, such as floods, drought and urban fire, if the individual hazard boundaries remain legible. Provide narrative and/or map info, which shows locations with past flooding problems and/or repetitive loss properties. 		X		X

		<ul style="list-style-type: none"> Note any data limitations for profiling hazards, such as identifying fuel types or vegetation cover for wildfires, and include in the mitigation strategy actions for collecting the data to complete and improve future risk analysis efforts. Avoid using state or national scale maps. Use maps that show clearly all participating jurisdictional boundaries. Use maps that can be copied by black/white reproduction and retain the information content and only include text at a scale that can be easily read. <p>See <i>Understanding Your Risks</i> (FEMA 386-2), Step 2, Pages 2-3 to 2-6 and Step 3, Pages 3-6 for more information on mapping techniques. Even if GIS is not available, there are a number of websites that can be useful in developing maps for specific locations. Consider viewing the following on the internet www.hazards.gov, www.nationalmap.gov, www.nationalatlas.gov, www.geodata.gov, and www.geomac.gov</p>				
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?	Pages 9 to 50	The extent and magnitude of hazards is presented in the plan. Descriptions of past events are described for each hazard.		X		X
C. Does the plan provide information on previous occurrences of each hazard addressed in the plan?	Pages 9 to 50	<p>The historic occurrences for each hazard assessed are outlined in the plan and described in detail.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Presidential Emergency Declarations could be noted in the plan as part of previous events. For more information, please see Refer to http://www.fema.gov/news/disaster_totals_annual.fema for presidential declaration information in your community. For Presidential Declarations look up: Current: http://www.rurdev.usda.gov/rd/disasters/ and Past: http://www.peripresdecusa.org/mainframe.htm - select begin search to get information at the county level. 		X		X

D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?	Pages 9 to 50	<p>The frequency of past events is presented in the plan and an associated probability is provided for each hazard assessment. Table 3-19 on page 42 indicates the probability of hazards based on period of years and number of events to obtain the frequency – rated as infrequent, and common.</p> <p>Recommended Revisions:</p> <p>Provide a more qualitative probability of its occurrence (e.g., low, medium, high) versus assigning two options – infrequent and common.-</p> <p>For more information on profiling hazards, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 2.</p>				
SUMMARY SCORE				X		X

Assessing Vulnerability: Overview

- **Multihazard Requirement §201.6(c)(2)(ii):** *[The risk assessment **shall** include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, ..., and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Tables 3-20 to 3-22: Pages 49-50	<p>Vulnerability is described in a combination of ways in the Risk Assessment. It is assessed relating to: frequency, magnitude (% of assets or population affected by event), building exposure, societal exposure, and critical facility exposure.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ The plan can be further strengthened by better relating types of hazards and the specific impact the hazard has on a community. Are there schools and grocery stores in places likely to flood – where? Are there older structures or neighborhoods that are either historic or built before building codes were developed that address high winds and/or snowloads? – where? Are there properties or roads that have been impacted by repetitive flooding? Which power lines are most likely to be impacted by repetitive winter ice storms or strong winds? 		X		X
B. Does the plan address the impact of each hazard on the jurisdiction?	Pages 9-50	<p>The historical data on past events outlines the types and extent of impacts that specific hazards present to communities. More specifically, population impacts, impact of future development are assessed for each hazard.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ Impacts can relate to loss of life, economic loss, 		X		X

		water quality damage, environmental losses, and closure of schools, businesses and infrastructure. Other impacts include loss of homes, historic preservation losses, along with growth management and rebuilding challenges.				
SUMMARY SCORE				X		X

Assessing Vulnerability: Identifying Structures

- **Multihazard Requirement §201.6(c)(2)(ii)(A):** *The plan **should** describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including **estimates of the number and type of structures at risk, repetitive loss properties**,....*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings (including repetitive loss structures) , infrastructure, and critical facilities located in the identified hazard areas?	Pages 42-50	<p>The plan does provide a discussion on existing infrastructure and critical facilities, and identifies the structures (the exposure of structures) within hazard prone areas.</p> <p>Required FMA Revisions:</p> <p>While not required by the Stafford Rule but required for the FMA Rule, it is necessary (for FMA) to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims.</p> <p>Recommended Revisions:</p> <p>Base hazard prone areas on locations of past events as well as on populated areas in the county.</p> <p>Identify the kinds of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical</p>		X	X	

		<p>facilities (e.g., shelters, hospitals, police, and fire stations).</p> <p>Describe the process or method used for identifying existing buildings, infrastructure, and critical facilities.</p> <p>While not required by the Stafford Rule it is recommended to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims.</p> <p>Since limited data are available, identify the collection of data for buildings and infrastructure in hazard prone areas as an action item in the mitigation strategy.</p> <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.</p>				
B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?	Pages 38-40	<p>The plan provides a discussion on Future Growth and Land Use Trends, and states "Although local officials have indicated that there are no future building, infrastructure or critical facilities proposed that would be in identified hazard areas, mitigation options will be considered in future land use decisions."</p> <p>Recommended Revisions:</p> <p>Describe the process or method used for identifying future buildings, infrastructure, and critical facilities.</p> <p>Note any data limitations for determining the type and numbers of future buildings, infrastructure, and critical facilities and include in the mitigation strategy actions for collecting the data to improve future vulnerability assessment efforts.</p>		X		X

		<p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p>				
SUMMARY SCORE				X	X	

Assessing Vulnerability: Estimating Potential Losses

- **Multihazard Requirement §201.6(c)(2)(ii)(B):** *[The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan estimate potential dollar losses to vulnerable structures?	Pages 46 -50	<p>The risk assessment portion of the plan does provide a discussion on potential dollar losses for natural hazard types.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p>		X		X
B. Does the plan describe the methodology used to prepare the estimate?	Pages 46-47	<p>The method used to prepare potential loss estimates and general vulnerability is described in the plan. It is based on calculations of frequency, exposure and hazard loss magnitude.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p>		X		X
SUMMARY SCORE				X		X

Assessing Vulnerability: Analyzing Development Trends

- **Multihazard Requirement §201.6(c)(2)(ii)(C):** *[The plan **should** describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe land uses and development trends?	Pages 38-40	<p>The plan provides the information available regarding future growth and land use trends. The consultants used information from Snowy Mountain Development Corporation of Central Montana. They indicated eight development projects that will likely result in new infrastructure (see page 39). However, on page 40, the plan indicates that local officials have indicated that there are no future buildings; infrastructure or critical facilities proposed that would be located in identified hazard areas. Mitigation options will be considered in future land use decisions.</p> <p>Recommended Revisions:</p> <p>Provide a general overview of land uses (e.g., location and kind of use).</p> <p>Additional Suggestions:</p> <p>Describe existing land use densities in the identified hazard areas.</p> <p>Describe future land use density. Such information may be obtained from your regional or local planning office, comprehensive plan, or zoning maps. Future development information helps to define appropriate mitigation approaches and the locations in which these approaches should be applied. This information can also be used to reduce development in hazard areas.</p> <p>Overlay a land use map with identified hazard areas.</p> <p>Note any data limitations for determining development trends and include in the mitigation strategy actions for collecting the data to complete and improve future vulnerability assessment efforts.</p>				
				X		X

		Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.				
		SUMMARY SCORE		X		X

Multi-Jurisdictional Risk Assessment

- **Multihazard Requirement §201.6(c)(2)(iii):** *For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Pages 49-50	<p>The plan addresses the hazard prone areas within the County and maps, Figures 3-3 to 3-5, areas considered to be flood, transportation hazards and cumulative hazard prone. Pages 49-50 provide tables (3-20 to 3-22) - summarizing the risk assessment per high priority hazard for the three jurisdictions seeking plan approval.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ Prepare a matrix of the various jurisdictions and the range of hazards to show which risks are common and which are unique. ▪ If the CWPP is available, the elements of the CWPP should be incorporated into this plan, but, being an appendix, cannot serve as a replacement for incorporating relevant information into the PDM plan. This multi-hazard mitigation plan should be a process of its own and not be dependent on past planning processes. ▪ Consider differences in topography and elevation in your evaluation of hazard prone areas. 		X		X

		<p>For more information on creating a detailed risk assessment, see Understanding Your Risks (FEMA 386-2), Steps 1 - 4.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.</p>				
SUMMARY SCORE				X		X

MITIGATION STRATEGY: §201.6(c)(3): *The plan shall include a mitigation strategy that provides the jurisdiction’s blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.*

Local Hazard Mitigation Goals

- **Multihazard Requirement §201.6(c)(3)(i):** *[The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.*
- **FMA Requirement §78.5(c):** *The applicant’s floodplain management goals for the area covered by the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer’s Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as “eliminate flood damage”; and are based on the risk assessment findings.)	Pages 51 to 53	<p>A total of six goals are provided in the plan and are appropriate.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ The plan’s goals, objectives, strategies, priorities, and projects are a mixture of prevention, preparedness, response, and mitigation. While mitigation does have elements of these other phases of a disaster, the emphasis for this plan should in future updates focus more on the <u>mitigation</u> strategy of its participating jurisdictions. ▪ Describe how these goals were developed. The goals could be developed early in the planning process and refined based on the risk assessment findings, or developed entirely after 		X		X

		<p>the risk assessment is completed. They should also be compatible with the goals of the jurisdiction as expressed in other documents.</p> <ul style="list-style-type: none"> Also, ensure that these goals and objectives are LONG-TERM, which then follows with long term strategies, actions, and projects. Describe the goals development process in detail – such as who was involved and the steps taken to identify the goals. <p>For more information on developing local mitigation goals and objectives, see Developing the Mitigation Plan (FEMA 386-3), Step 1.</p>				
SUMMARY SCORE				X		X

Identification and Analysis of Mitigation Actions

- Multihazard Requirement §201.6(c)(3)(ii):** *[The mitigation strategy **shall** include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.*
- FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	Pages 51 to 53	<p>A comprehensive range of mitigation actions - 33 are identified in the plan.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> List actions to address data limitations. Discuss who participated in the mitigation action development process. Consider strengthening the identification and evaluation of potential loss-reduction actions for each objective. Then, narrow down this list of potential actions to include only those that have 		X		X

		<p>been deemed the most feasible after consideration of a range of factors such as costs, benefits, expected degree of public support, local capabilities, and potential environmental impacts. Clearly describe the evaluation process, explaining why certain action items were screened out.</p> <ul style="list-style-type: none"> Actions must correlate to the findings of the risk assessment. It is recommended to provide at least two actions for each hazard assessed. <p>For more details on identifying and evaluating mitigation actions, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 2.</p>				
B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	Pages 51 to 53	<p>Coordination of fuels reduction projects would protect new and existing buildings in the county. Safety film for windows would protect existing and future buildings where they are installed.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Include actions that address new buildings and infrastructure for all applicable hazards. While the Rule does not specify critical facilities, the plan should also address new critical facilities. Address the new development proposed with annexations and/or redevelopment. <p>For more details on identifying and evaluating mitigation actions, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 2.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</p>		X		X
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	Pages 51 to 53	<p>Coordination of fuels reduction projects would protect new and existing buildings in the county. Safety film for windows would protect existing and future buildings where they are installed.</p>		X		X

		<p>Recommended Revisions:</p> <ul style="list-style-type: none"> Note that warning systems, which protect life, do little to protect the built environment. Develop a matrix to show what actions address specific hazards and existing buildings and infrastructure. <p>For more details on identifying and evaluating mitigation actions, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 2.</p>				
SUMMARY SCORE				X		X

Implementation of Mitigation Actions

- Multihazard Requirement: §201.6(c)(3)(iii):** *[The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.*
- FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered; and*
- FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	Pages 54-58	<p>Table 4-1 describes the ranking of the cost-benefit scoring based on population impacted, property impacted, project feasibility and costs. Table 4-2 ranks all the mitigation actions.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Provide definitions for your prioritization/ranking system. Describe how the public was involved and who participated in the prioritization process for 		X		X

		<p>mitigation actions.</p> <ul style="list-style-type: none"> Consider using the FEMA approved STAPLEE method to prioritize mitigation actions. See "How To" manuals at http://www.fema.gov/fima/resources.shtm. Integrate prioritization process with applicable CWPP. <p>For a detailed description of the development of the mitigation strategy or action plan for the plan's updates, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 3.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</p>				
B. Does the mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Pages 59-65	<p>Tables 4-3 and 4-4 provide information such as the lead agency, funding sources, and a timeframe for completion for high priority mitigation actions.</p> <p>Recommended Revisions</p> <p>The plan would be improved if additional funding partners were identified, such as The Nature Conservancy at www.nature.org and the Sonoran Institute at www.sonoran.org, etc.</p>		X		X
B.1. Does the mitigation strategy address continued compliance with the NFIP?	Page 14	<p>Continued compliance is addressed. "Wheatland County and the City of Harlowton passed a floodplain and floodway management ordinance to comply with the Montana Floodplain and Floodway Management Act and to ensure compliance with requirements for continued participation in the National Flood Insurance Program."</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.</p>		X		X
C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits?	Pages 54-58	<p>Table 4-1 describes the ranking of the cost-benefit scoring based on population impacted, property impacted, project feasibility and costs. Table 4-2 ranks all the mitigation actions utilizing cost benefit review criteria.</p>		X		X

		Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.				
C.1. Does the mitigation strategy emphasize cost-effective and technically feasible mitigation actions?	Pages 54-58	The plan also prioritized mitigation actions taking project feasibility into account see Table 4.2. Note: A “Needs Improvement” score on this requirement will not preclude the Stafford plan from passing.		X		X
SUMMARY SCORE				X		X

Multi-Jurisdictional Mitigation Actions

- **Multihazard Requirement §201.6(c)(3)(iv):** *For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan?	Pages 51-53	Specific mitigation actions for Judith Gap, Harlowton and Wheatland County are presented in the plan. Recommended Revisions: <ul style="list-style-type: none"> For each participating jurisdiction, include the responsible party(s)/agency(s), the funding source(s), and the target completion dates for each action in the mitigation strategy section. For more information on the development of the mitigation strategy or action plan, see <i>Developing the Mitigation Plan</i> (386-3), Step 3.		X		X
SUMMARY SCORE				X		X

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

- **Multihazard Requirement §201.6(c)(4)(i):** *[The plan maintenance process **shall** include a] section describing the method and schedule of monitoring,*

evaluating, and updating the mitigation plan within a five-year cycle.

- **FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe the method and schedule for monitoring the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Pages 66-67	<p>The plan will be reviewed every two years or as deemed necessary by knowledge of new hazards, vulnerabilities, or other pertinent reasons. The DES Coordinator will be responsible for scheduling a meeting with the board of county commissioners to update the plan. The monitor/review will determine if the plan requires an update prior to the five-year cycle.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Monitoring may include periodic reports by agencies involved in implementing actions; parameters to measure the progress of the actions; and action completion dates. It is recommended to highlight a process and outreach for all three requirements regarding - monitoring, evaluating, and updating your plan. It is recommended to consider each jurisdiction seeking plan approval in these processes (One person from each jurisdiction doing reviews? Or is one county or EM person taking care of all of this?) It is recommended to provide a schedule for all three element requirements that includes report generation, site visits for projects, and how contacts between responsible parties and outreach will occur. <p>For guidance on monitoring the plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2.</p>		X		X
B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include	Pages 66-67	The plan will be evaluated based on knowledge of new hazards, vulnerabilities or other pertinent reasons. The DES Coordinator will schedule the		X		X

the criteria used to evaluate the plan?)		County Board of Commissioner meeting to evaluate the plan. The meeting will be open to the public. The risk assessment portion will be reviewed at this time. Critical facilities information will be updated. Project success will be presented in a mitigation action status report. The status report will be published in the local newspaper.				
C. Does the plan describe the method and schedule for updating the plan within the five-year cycle?	Pages 66-67	Every five years, the plan will be submitted to the Montana SHMO and FEMA for review and approval. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		X
SUMMARY SCORE				X		X

Incorporation into Existing Planning Mechanisms

- **Multihazard Requirement §201.6(c)(4)(ii):** *[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Pages 66-67; Appendix E	The Board of County Commissioners and the DES Coordinator will continue to identify options for incorporation of PDM requirements into future plans and policies. Existing planning mechanisms are identified in Appendix E for the three jurisdictions seeking plan approval. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		X
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Pages 66-67; Appendix E	Local officials will work with county departments to ensure hazard mitigation projects are consistent with planning goals and integrate them, where appropriate. Meetings of the Board will provide the opportunity for local officials to report back on the progress made on the integration of planning elements into county planning documents and procedures. Appendix E identifies plan revisions for existing planning mechanisms as the process for		X		X

Jurisdiction: Wheatland County, Montana

		incorporation. <i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i>				
SUMMARY SCORE				X		X

Continued Public Involvement

- **Multihazard Requirement §201.6(c)(4)(iii):** *[The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)	Page 67	<p>A series of public meetings will be held prior to each two-year review and five-year update or as necessary. The DES Coordinator will be responsible for using county resources to publicize the annual public meetings and maintain public involvement through the newspapers and radio.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ Reference capital improvement programs (CIPs) as a potential planning mechanism when applicable. ▪ Make sure to engage the existing planning departments and other mechanisms in your community during the planning process. <p>For more information on integrating hazard mitigation activities in other initiatives, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</p>		X		X
SUMMARY SCORE				X		X